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GUIDELINES FOR PREPARATION OF AN ENVIRONMENTAL PROTECTION PLAN FOR OIL AND GAS PROJECTS

Co-ordination and Assessment Branch
Saskatchewan Environment

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A. DEFINITION AND OBJECTIVE

An Environmental Protection Plan (EPP) is a document prepared by a project proponent describing how a project proposed for an environmentally sensitive area will be undertaken. It describes special measures to be included to ensure environmental protection.

The objective of the EPP is to ensure that environmental protection is included amongst other primary project goals during project planning, and that this planning forms the basis for an environmentally sound project. Plan preparation encourages early and systematic incorporation of environmental considerations, and includes a mechanism by which the plan is reviewed by government agencies and, on occasion, by public interest groups. While directed specifically to operators on Crown lands, points in these guidelines are equally applicable to any terrain-sensitive lands.

B. PROCEDURES

This section outlines a generalized procedure whereby the need for an EPP is identified, the plan prepared, and governmental review completed.

NOTE, however, that the following points describe procedures administered by Saskatchewan Environment. In the case of all lands within Provincial Parks, an EPP will be requested by Saskatchewan Parks prior to exploration or development, and all proponent contact should be with that agency. If Saskatchewan Environment should determine, in consultation with Saskatchewan Parks, that an environmental impact assessment is required (see Guideline B.4), then requirements under The Environmental Assessment Act would be administered by Saskatchewan Environment.

1. Notices of Sale of Petroleum and Natural Gas Rights published quarterly by Saskatchewan Energy and Mines specify when environmentally sensitive surface lands overly the minerals offered for sale. Potential bidders are invited to contact Saskatchewan Environment for further information.
2. Purchasers of mineral rights underlying these sensitive lands will be contacted by Saskatchewan Environment and advised as to which of the approaches outlined below will be followed:
   a) Purchasers of minerals in areas that are of some concern but are not considered to be "highly sensitive" (e.g., most native prairie rangeland) will be advised to follow Saskatchewan Environment's Guidelines for Conducting Seismic

Exploration on Environmentally Sensitive Lands in Southern Saskatchewan and the Guidelines for Oil and Gas Development on Environmentally Sensitive Lands in Southern Saskatchewan. Project sites may be inspected, but Saskatchewan Environment normally will not require formal project review or follow-up monitoring.

b) Purchasers of minerals in more highly sensitive areas (e.g., dune sands, erosible slopes, badlands or relict native prairie) or in Provincial Parks will be advised of the concerns for that area and requested to prepare an EPP prior to initiating exploration and/or development (Guidelines B.3 to B.8).

3. Proponents of exploration (seismic or drilling) or development in highly sensitive areas will be requested to provide the following information during their project-planning phase:

a) to the extent feasible, a general Development Plan for the lands held; and

b) an EPP for the specific works planned. A separate EPP would normally be prepared for each planning period (e.g., annually). The plan should follow the basic format in Section C, modified as appropriate.

4. Ten copies of the plan should be filed with Saskatchewan

Environment. The EPP will be treated as a project proposal submitted for screening under the environmental assessment process, and will be reviewed by various provincial agencies. The review, requiring about one month, will determine if the proposed protective measures are adequate and if an environmental impact assessment (EIA) is required under criteria described in The Environmental Assessment Act (Appendix).

a) If an EIA is necessary, then the proponent will be advised and detailed project-specific assessment guidelines will be prepared by Saskatchewan Environment. The EIA, which normally takes six months or more, must be completed by the proponent, and the necessary Ministerial Approval obtained, before development work may begin.

b) If an EIA is not necessary, then the proponent will be advised to proceed with the project, subject to:
- commitments in the EPP;
- other guidelines issued by Saskatchewan Environment; and
- other regulatory requirements.

c) Additional information and/or commitments may be requested by the department prior to indicating the need for an EIA.

5. Saskatchewan Environment will work closely with the proponent throughout the review and development

sequence, and may inspect the area during site selection, construction, and clean-up and reclamation, and periodically thereafter.

6. The EPP should incorporate clearly and in some detail the proponent's plans and commitments for environmental-protection measures, post-construction rehabilitation and monitoring, and reporting.

7. While other guidelines prepared by Saskatchewan Environment (e.g., guidelines dealing with seismic exploration, oil and gas development, and reclamation of sensitive terrain) may provide a basis for the EPP, they should be substantially augmented and made project-specific (location, time, procedures) as necessary for each site.

8. EPP preparation, implementation and follow-up normally should be undertaken by professionals in the respective disciplines. Involvement of local government and the local public is also important.

C. TABLE OF CONTENTS FOR A MODEL EPP

1. Introduction
2. Project Description
3. Environmental Setting
   - vegetation and land use
   - geology and soils
   - aquatic environment

- wildlife
- archaeology/heritage resources
- social issues (including municipal government)
- other concerns

4. Route/Site Selection
   - including alternatives considered
5. Potential Impacts and Mitigation
   - surface disturbance
   - wildlife
   - other impacts
6. Environmental Protection Plan
   - general environmental-protection procedures
   - right-of-way/site protection
   - reclamation plan
7. Monitoring
8. Alignment Sheets, Maps, or Airphotos.

Note: This model is general, and should be adapted to meet specific project and locational details.

APPENDIX

The Environmental Assessment Act provides that:

9.(1) The proponent of a development shall, in accordance with the regulations:

(a) conduct an environmental impact assessment of the development; and

(b) prepare and submit to the minister an environmental impact statement relating to the development.

(2) The proponent shall bear all costs incurred in carrying out an assessment and in the preparation and submission of a statement. 1979-80 c. E-10-1, s. 9.

A "development" is defined as:

2.(d) "development" means any project, operation or activity or any alteration or expansion of any project, operation or activity which is likely to:

(i) have an affect on any unique, rare or endangered feature of the environment;

(ii) substantially utilize any provincial resource and in so doing pre-empt the use, or potential use, of that resource for any other purpose;

(iii) cause the emission of any pollutants or create by-products, residual or waste products which require handling and disposal in a manner that is not regulated by any other Act or regulation;

(iv) cause widespread public concern because of potential environmental changes;

(v) involve a new technology that is concerned with resource utilization and that may induce significant environmental change; or

(vi) have a significant impact on the environment or necessitate a further development which is likely to have a significant impact on the environment.